



DIVISION OF ENVIRONMENTAL PROTECTION

GASTON CAPERTON
GOVERNOR

1304 Goose Run Road
Fairmont, WV 26554-1392

LAIDLEY ELI McCOY, Ph.D.
DIRECTOR

August 9, 1996

Environmental Protection Services
4 Industrial Park Drive
PO Box 710
Wheeling, WV 26003-0091

Attention: Mr. Dan Bozym

Dear Mr. Bozym:

Enclosed is a copy of the **Pre-Combustion Inspection (PCI) Report** completed on your facility by a representative of the Chief from the Office of Waste Management. This report is based on the inspection conducted on July 16, 1996.

There were no areas of non-compliance with the appropriate Hazardous Waste Management Regulations documented during the inspection.

Thank you for your assistance and cooperation during this inspection. If you have any questions concerning the inspection or attached report, please feel free to contact this office at (304) 367-2724.

Sincerely,

A handwritten signature in black ink, appearing to read "Stanley J. Moskal".

Stanley J. Moskal
Environmental Inspector Supervisor
Compliance Monitoring and Enforcement
Office of Waste Management

SJM:st

Enclosure:

cc: Jeanne Sofield, U.S. EPA, Region III ✓
John C. Hando, Inspector
RCRA File

INSPECTION FACT SHEET

COMPANY NAME: Environmental Protection Services I.D.#: WVD988770673

MAILING ADDRESS: 4 Industrial Park Drive
PO Box 710
Wheeling, WV 26003-0091

TYPE OF FACILITY: Generator
(UsedOil)

LOCATION:

COUNTY: Ohio

COMPANY CONTACT: Mr. Dan Bozym

HANDLING CODES: S01

PHONE: (304) 232-1590

PURPOSE: Pre-Combustion Inspection

APPLICABLE REGULATIONS: West Virginia Hazardous Waste Management Act, Chapter 22-18;
West Virginia Administrative Regulations for Chapter 22-18;
and/or 40 CFR Parts 260 thru 279

LIST OF CHEMICALS:

(For Small Quantity Generators, list amount of waste, how it is handled, where it goes)
Used Oil

___ DETERMINATION PENDING

___ NOT APPLICABLE

___ VIOLATIONS

X NO VIOLATIONS

DATE INSPECTED: July 16, 1996

INSPECTOR: (1) John C. Hando, West Virginia Division of Environmental Protection,
Office of Waste Management, Fairmont District Office

(2) James Gaston, West Virginia Division of Environmental Protection,
Office of Waste Management, Wheeling Field Office

DATE PREPARED: July 18, 1996

PREPARED BY: John C. Hando, Office of Waste Management

INSPECTION REPORT

RE: Environmental Protection Services (WVD988770673)

DATE INSPECTED: July 16, 1996

INSPECTOR: John C. Hando, West Virginia Division of Environmental Protection,
Office of Waste Management, Fairmont District Office

James A. Gaston, West Virginia Division of Environmental Protection,
Office of Waste Management, Wheeling Field Office

Richard Fenton, West Virginia Division of Environmental Protection,
Office of Air Quality

Dave White, West Virginia Division of Environmental Protection,
Office of Air Quality

John McClung, West Virginia Division of Environmental Protection,
Office of Air Quality

Bernie Lambert, West Virginia Division of Environmental Protection,
Office of Air Quality

DATE PREPARED: July 18, 1996

PREPARED BY: John C. Hando, Office of Waste Management

On July 16, 1996, the above referenced inspectors conducted a Pre-Combustion Inspection at Environmental Protection Services (EPS), in Wheeling, West Virginia. Upon our arrival we met with Mr. Daniel Bozym and informed him of our intentions to inspect this facility.

Upon presentation of appropriate credentials the company official was informed of our authority as representatives of the Director of the Division of Environmental Protection pursuant to Chapter 22 of the Code of West Virginia and as specified by Section 3007(a) of the Resource Conservation and Recovery Act. He acknowledged our authority. The company official was informed that this inspection would emphasize the company's compliance with the Hazardous Waste Management Act (Chapter 22, Article 18), and the regulations promulgated thereunder.

This facility rebuilds and scraps transformers and other potential PCB containing equipment. The only change since the last inspection is in mercury reclamation. EPS is no longer accepting mercury contaminated material.

Pre-Combustion Inspection (Environmental Protection Services 4 Industrial Park Drive, PO Box 710, Wheeling, West Virginia 26003-0091)

EPA ID# WVD988770673

July 16, 1996

Page two

All incoming transformers are assigned a unique bar code identification number. All transformers are placed inside the building in a diked area. An oil sample is obtained from all filled units. Samples are batched per manifest load and analyzed. Units with less than 50 ppm PCBs are drained and stored in the Thermal Reduction Furnace staging area. The oil is placed into one of three used oil storage tanks, (tanks 3, 4 and 5). Once full, these tanks are tested for PCB content. If the total PCB content is less than 50 ppm, the oil is transferred to one of two external, 20,000 gallon used oil tanks. The oil from these two tanks is utilized as fuel in the afterburner device on the Thermal Reduction Furnace.

Units that contain oil with a total PCB content between 50 ppm and 500 ppm are drained and the units are then stored in the Thermal Reduction Furnace staging area. The drained oil is placed in a PCB oil storage tank (tank 6). Once full, the PCB oil is sent to an EPA approved incinerator or detoxification facility.

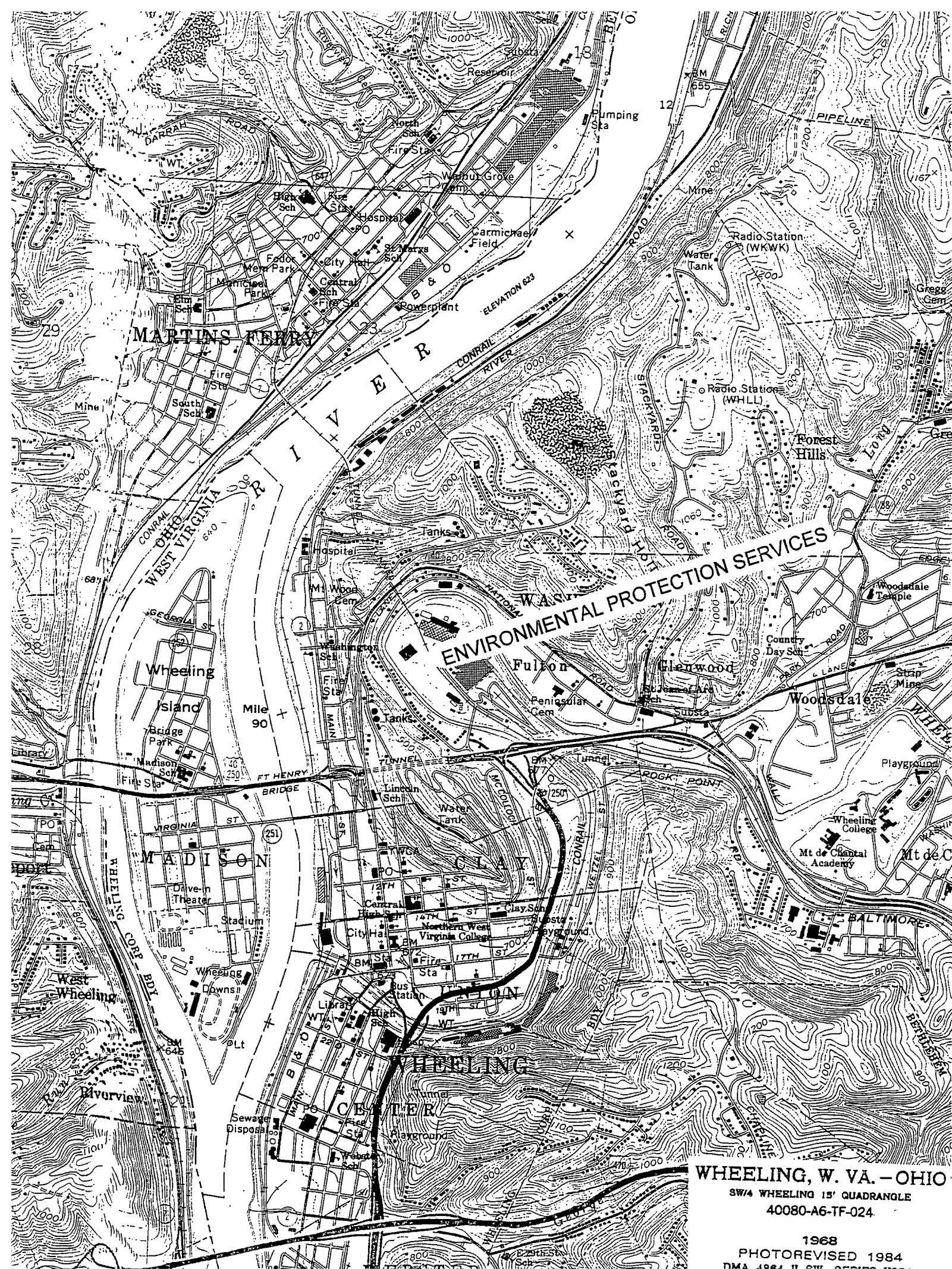
Units with oil containing more than 500 ppm total PCBs are placed in a double diked storage area. The oil is placed into tank 6. The units are then sent to an EPA permitted disposal facility.

All units in the staging area will eventually be placed into the Thermal Reduction Furnace (Air Quality permit attached). Following treatment in the furnace, units are removed and allowed to cool in a Cool Down Chamber. Once cool, the units are placed on a vibration table with an ash collection system. The ash is sent with scrap copper to a copper smelter.

All units are disassembled and metals are separated by types. Types of metal separated include, aluminum, copper and steel. All metals are shipped off-site for recycling.

COMPLIANCE EVALUATION

There were no violations of either State or Federal Hazardous Waste Regulations noted during this inspection.



WHEELING, W. VA. - OHIO
SW 1/4 WHEELING 15' QUADRANGLE
40080-A6-TF-024

1968
PHOTOREVISED 1984
DMA 4861 II SW OFFICE



**Division of Environmental Protection
Office of Air Quality**

INSPECTION FACT SHEET

COMPANY NAME: Environmental Protection Services, Inc.

EPA ID #: WVD988770673
PLANT ID #: 03-54-069-0008
PERMIT #: R13-1264, R13-1503A

MAILING ADDRESS: 4 Industrial Park Drive
P.O. Box 710
Wheeling, WV 26003

FACILITY TYPE: Incinerator (2)
LOCATION: Wheeling
COUNTY: Ohio
REGION: 1

COMPANY CONTACT: Dan Bozym, Environmental Manager
PHONE: (304) 232-1590

PURPOSE: Regulatory applicability, compliance evaluation
APPLICABLE REGS: 13, 25

DATE INSPECTED: July 16, 1996
INSPECTORS: J. D. McClung, OAQ, Charleston Office
R. W. Fenton, OAQ, Charleston Office
D. W. White, OAQ, Charleston Office
B. Lombard, OAQ, Wheeling Office
J. Hando, OWM, Fairmont Office
J. Gaston, OWM, Wheeling Office

DATE PREPARED: July 18, 1996
PREPARED BY: J. D. McClung
REVIEWED BY: L. S. Pontiveros

FACILITY STATUS CODE: 30
VIOLATIONS: None



INSPECTION MEMORANDUM

DIVISION OF ENVIRONMENTAL PROTECTION

West Virginia Office of Air Quality

Company:	Env. Protection Services, Inc.			Facility:	Wheeling
Region:	1	Plant ID#:	03-54-069-0008	Regulations:	13, 25

Inspected By: Jonathan D. McClung

Title: Engineer-in-Training I

Memo Date: July 18, 1996

Inspection Date: July 16, 1996

On July 16, 1996, at approximately 11:50 a.m., an unannounced inspection was conducted of Environmental Protection Services, Inc. located in Wheeling, WV. The contact person at the facility was Dan Bozym, Environmental Manager. The weather was partly cloudy with temperatures in the upper seventies (°F). The inspection lasted approximately 2.5 hours.

The following personnel were present during the inspection: Office of Air Quality, Charleston, Jonathan McClung, Richard Fenton, and David White; Office of Air Quality, Wheeling, Bernie Lombard; Office of Waste Management, Fairmont, John Hando; Office of Waste Management, Wheeling, Jim Gaston.

Environmental Protection Services, Inc. (EPS) operates a metal salvage facility in Wheeling, WV. The facility receives electrical equipment containing dielectric oil. The first step in their salvage process is to pump the majority of the oil contained in the electrical device to a storage tank. Next, the device is placed in one of two furnaces in order to incinerate the remaining dielectric oil. Finally, the device is removed from the furnace, dismantled, and then separated according to the type of metal. EPS holds two Regulation 13 permits, R13-1264 and R13-1503A, that allow the operation of two incinerators that burn the residual oil in the electrical devices. The purpose of the inspection was to determine if any hazardous wastes are fed to these incinerators.

The first unit inspected was the incinerator operating under permit R13-1264. Mr. Bozym indicated that the unit had not been operated since October, 1995. The log sheets at the incinerator were reviewed and they indicated that the incinerator had not been operated since 1995. No heat was detected from the unit. At this time, the opportunity was taken to ask Mr. Bozym about the hazardous waste and mercury acceptance practices at the facility. Mr. Bozym indicated that they no longer treat any devices that contain mercury nor do they treat any RCRA hazardous waste materials. He stated that if they do receive such types of materials then they would return those items to the corresponding owner on the next available out-going truck.

Inspection of Environmental Protection Services, Inc.
Inspected on July 16, 1996
Page 1

Photographs Taken:	No	ITS Updated:	No
Visual Emissions Taken:	No	Facility Status Code:	30

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Adjacent to the R13-1264 incinerator were several palettes of material labeled as "HAZARDOUS WASTE". The label on one of the packages also contained the following information: Name: LILCO (acronym for Long Island Lighting Company)
Manifest Document No: NYD006866008
EPA Waste No: B004

Mr. Bozym indicated that the material on these palettes were gas meters and that they were received from New York. He stated that these items contained polychlorinated biphenyl (PCB) contaminated oil and that in New York these materials are defined as hazardous waste. He added that these materials are not defined as hazardous waste in West Virginia. The oil from these devices is also drained and sent to storage tanks. The remaining device is then placed in one of the incinerators to burn the residual oil.

Mr. Bozym provided the strategy that the facility uses in handling all PCB contaminated oil. He indicated that oil having a PCB concentration less than 50 ppm is burned in the afterburner of unit R13-1503A. Oil having a PCB concentration in excess of 50 ppm is stored in a separate tank and is shipped off-site on a quarterly basis to a disposal facility.

The next unit inspected was the incinerator operating under permit R13-1503A. This unit was in operation during the inspection. Table 1 provides the permit limits and the observed operating conditions of the incinerator during the inspection. The unit was operating within the limits of the permit during the inspection.

Table 1. Permit R13-1503A limits vs. Observed Operating Conditions

Parameter	Permit Limit	Observed Value
Minimum combustion gas temperature	2200 °F (±212 °F)	2202 °F
Minimum oxygen concentration	3 %	9.9 %
Carbon monoxide concentration	No Limit	17 ppm
Carbon dioxide concentration	No Limit	7.7 ppm

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The final area of the inspection was the mercury handling portion of the facility. Mr. Bozym indicated that the area had not been used for approximately one year.

Upon concluding the inspection of the facility, the group traveled to Mr. Bozym's office where various records were reviewed by Mr. White and Mr. Hando.

Environmental Protection Services, Inc. is not feeding hazardous wastes to either of their 45CSR13 permitted incinerators. The facility, therefore, is not subject to the requirements of 45CSR25.

Jonathan D. McClung
Jonathan D. McClung
Engineer-in-Training I

July 18, 1996
July 18, 1996

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